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December 2, 2024

BY ECF

Hon. Jennifer L. Rochon
U.S. District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Keith Taylor*
24-cr-00524 (JLR)

Dear Judge Rochon:

I represent defendant Keith Taylor in the case referenced above and write in reference to the defense motions deadline currently set for December 2, 2024. The defense remains in the process of reviewing the Rule 16 discovery produced by the government. In addition, the defense and the U.S. Attorney's Office continue to work to resolve technology issues which has thus far prevented the defense from accessing Mr. Taylor's electronic device data produced by the government thus far. Lastly, the government has advised that it intends to produce additional data related to other devices seized from Mr. Taylor's apartment and will do so once the technology issues referenced above have been resolved.

The current schedule contemplates that defense motions shall be filed by December 2, 2024. At this time, the defense does not have any motions to file. However, the defense would request the opportunity to do so in the event that discovery accessed after the December 2 deadline provides grounds, in the defense's view, for pretrial motions relevant to that discovery. I have conferred with counsel for the government, and I understand that the government is amenable to proceeding in this manner.

Respectfully submitted,

/s/Brian P. Ketcham
Brian P. Ketcham

Cc: AUSAs Rebecca Delfiner and Eli Mark (via ECF)